

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SureFunding, LLC,

Debtor.

Chapter 11

Case No. 20-10953 (LSS)

**STATEMENT OF BAYARD, P.A. PURSUANT TO
FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

In connection with the above-captioned chapter 11 case (the “**Chapter 11 Case**”) commenced by SureFunding, LLC (the “**Debtor**”) Bayard, P.A. (“**Bayard**”) hereby submits this statement (the “**Statement**”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (“**Bankruptcy Rule 2019**”) with respect to Bayard’s representation of the Ad Hoc Committee of SureFunding Noteholders (the “**Noteholders**”) comprised of certain participants (each a “**Participant**”) who made investments in the Debtor in exchange for notes executed by the Debtor. In support hereof, Bayard respectfully states as follows:

1. As of the date of this Statement, Bayard represents the Noteholders in the Chapter 11 Case.

2. On or about May 4, 2020, the Noteholders retained Bayard to represent them in connection with the Chapter 11 Case.

3. As of the date hereof, Bayard only represents the Noteholders in this Chapter 11 Case and does not represent or purport to represent any other entities in connection with this Chapter 11 Case.

4. In accordance with Bankruptcy Rule 2019(c), **Exhibit A** hereto lists the names, addresses, and the “nature and amount of all disclosable economic interests” held by each

Participant. The information contained in **Exhibit A** is based solely upon information provided by the Noteholders to Bayard without any independent verification by Bayard and is subject to change.

5. Nothing contained in this Statement is intended or shall be construed as (i) a waiver or release of any claim against the Debtors by any Participant of the Noteholders; (ii) an admission with respect to any fact or legal theory; or (iii) a waiver or release of any other rights, claims, actions, defenses, setoffs or recoupments to which the Noteholders may be entitled, in law or in equity, under any agreement or otherwise, with all of such rights, claims, actions, defenses, setoffs or recoupments being expressly reserved.

6. The undersigned verifies that the foregoing is true and correct to the best of their knowledge based on the information provided.

7. Bayard reserves the right to amend or supplement this Statement in accordance with Bankruptcy Rule 2019 or otherwise.

Dated: May 11, 2020
Wilmington, Delaware

BAYARD, P.A.

/s/ Scott D. Cousins

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*Counsel to the Ad Hoc Committee of
SureFunding Noteholders*

EXHIBIT A

Participant	Address	Secured Promissory Amount Issued by SureFunding	Claim (Outstanding as of May 11, 2020)
Wayne J. James	2903 Lepage St. Apt 3 New Orleans, LA 70119	Approximately \$34 million	In excess of \$2.1 million
Blake Coler-Dark	2975 Chillon Way Laguna Beach, CA 82651	Approximately \$34 million	\$60,000
Mark Teitelbaum	1810 N Kentucky Street Arlington, VA 22205	Approximately \$34 million	\$200,000